

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

GAVRILA STANCIU,

and,

ANAMARIA MIHAI,

Defendants.

UNDER SEAL

Criminal No. 1:24-mj-208

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT AND ARREST WARRANTS**

I, George J. Jasek, being duly sworn, hereby, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (“SA”) with the United States Secret Service (“USSS”) and have been so employed since March 2018. I am currently assigned to the Criminal Investigative Division in Washington, District of Columbia. In preparation for my employment with USSS, I completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Additionally, I completed the Special Agent Training Course at the USSS James J. Rowley Training Center in Laurel, Maryland. While attending SATC, I received a five-day training titled “Basic Investigation of Computer and Electronic Crimes Program.” In addition to these training programs, I have completed numerous in-service training courses related to constitutional law. Prior to my employment with USSS, I was a full-time certified Police Officer

in New Hampshire for more than five years. My present duties include the investigation of federal offenses, including, but not limited to, those involving financial fraud and its related activities. As part of my duties, I have conducted numerous financial crime and financial fraud investigations. These investigations have included but are not limited to federal violations of wire fraud, bank fraud, money laundering, and identity theft statutes. I have additionally received training regarding computers which includes Basic Network Intrusion Responder Training, Incident Response Analysis, and virtual currency training. I have training and experience understanding standard tools and techniques used in these financial fraud schemes, including but not limited to identifying skimmers and cameras.

2. I have investigated a variety of complex financial crimes, which required extensive document review, analysis and witness interviews. In addition, I have prepared and presented criminal complaints, arrest, and search warrants.

3. The facts and information contained in this affidavit are based on my personal knowledge of the investigation, my training and experience, the observations and reports of other law-enforcement officers, and information obtained from other agents and witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and arrest warrants and does not set forth all of my knowledge or all facts known to the United States about this investigation. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only and all dates, times, and dollar amounts are approximate.

4. I make this affidavit in support of a Criminal Complaint charging GAVRILA STANCIU ("STANCIU") and ANAMARIA MIHAI ("MIHAI") with conspiracy to commit access device fraud, in violation of Title 18, United States Code, Sections 1029(b)(2) and

1029(a)(2). More specifically, as set forth in greater detail below, there is probable cause to believe that, from on or about January 28, 2024 to on or about February 17, 2024, STANCIU and MIHAI conspired to knowingly, voluntarily, and with intent to defraud, use one or more unauthorized access devices during a one-year period, and did so by conducting transactions within the Eastern District of Virginia and elsewhere with cards that had been re-encoded with debit card numbers belonging to individuals whose debit card information was unlawfully captured without authorization by electronic devices surreptitiously installed at point-of-sale terminals located within the Eastern District of Virginia. Through their use of these unauthorized access devices, the defendants defrauded victims of more than \$1,000 in cash during this period.

BACKGROUND ON BANK CARD SKIMMING

5. Bank card skimming typically involves installing electronic devices, known as skimmers, to a debit card point-of-sale terminal such as an automated teller machine (“ATM”). Fraudsters overlay these skimmers on ATM slots in a manner that makes the skimmers inconspicuous to ATM users. When users insert their debit cards, the skimming device copies the data from the victim cards’ magnetic strip.

6. In addition to the skimmers, fraudsters may also attach makeshift cameras to the ATMs to capture the personal identification numbers (“PIN”) that the victims enter when using their cards. Oftentimes, these cameras are also designed to be inconspicuous to ATM users. The skimmers and cameras store this data and footage until the fraudster returns later to retrieve them and download the data. Once downloaded, certain equipment and software can be used to re-encode the data onto any card with a magnetic strip, such as a gift card or a hotel key card. The re-encoded card, in combination with the card’s corresponding PIN that was captured by the cameras,

can then be used by the fraudsters at point-of-sale terminals to access funds in the victim's account without the victim's authorization and without having to physically use the victim's debit card.

PROBABLE CAUSE

7. Pentagon Federal Credit Union ("PFCU") is a United States federal credit union that is headquartered in McLean, Virginia. PFCU offers a variety of financial services to its customers, such as checking and savings accounts, debit/credit cards, and branches and ATMs located throughout the United States. PFCU is federally insured by the National Credit Union Association.

8. PFCU representatives informed law enforcement that when a PFCU debit card is used at a PFCU ATM in Virginia, it will cause data to transfer via interstate wires. Specifically, data will be sent from the ATM to PFCU infrastructure in Dallas, Texas, or Kansas City, Missouri, before then being sent on to Omaha, Nebraska, for reconciliation with the cardholder's account. If a non-PFCU debit card is used at a PFCU ATM in Virginia, the data will follow a similar interstate path except instead of being sent to Omaha, Nebraska, the data will go to Visa's or Mastercard's networks for reconciliation with the cardholder's issuing bank. In both scenarios, the usage of PFCU ATMs in Virginia will cause data to be sent via interstate wires.

9. In or about January and February of 2024, PFCU fraud investigators noticed what appeared to be a skimming operation conducted by two individuals: a male individual, later identified as STANCIU and a female individual, later identified as MIHAI. PFCU voluntarily provided the U.S. Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") with information about this skimming operation, to include ATM surveillance footage and data from ATM activity logs.

January 28, 2024 – PFCU Kingstowne and Woodbridge Branches

10. Law enforcement reviewed footage that showed that on or about January 28, 2024, at approximately 5:25 a.m., STANCIU and MIHAI appeared to install a skimmer and camera onto a PFCU ATM located at PFCU's Kingstowne branch located in Alexandria, Virginia, within the Eastern District of Virginia. Figures 1 and 2 are screenshots taken from this ATM's surveillance footage. Figure 1 shows STANCIU attaching what appears to be a camera to the top of the ATM while Figure 2 shows STANCIU and MIHAI attaching what appears to be the skimmer (the skimmer can be seen in STANCIU's hands).



Figure 1



Figure 2

¹ Law enforcement obtained driver's license information for STANCIU from Florida's department of motor vehicles. By comparing STANCIU's driver's license photograph to images of the male individual captured by PFCU surveillance footage, law enforcement was able to confirm that the male individual was indeed STANCIU.

² Law enforcement obtained driver's license information for MIHAI from the state of Washington. Law enforcement obtained her driver's license photograph, compared it to images of her captured by PFCU surveillance cameras and determined that the female individual was MIHAI.

11. Law enforcement also observed footage that appeared to show STANCIU and MIHAI installing skimmers and cameras later that morning at approximately 6:07 a.m. onto two ATMs located at PFCU's Woodbridge branch, in Woodbridge, Virginia, within the Eastern District of Virginia. Surveillance footage from one of the ATMs, which was located at a covered portion of the branch's ATM drive-through lane, showed STANCIU installing what appears to be a camera (see Figure 3) and a skimmer (see Figure 4). Footage showed MIHAI and STANCIU doing the same to the other ATM, which appeared to be located at an uncovered portion of the drive-through lane (see Figures 5 and 6).



Figure 3



Figure 4



Figure 5



Figure 6

12. Law enforcement observed footage that showed MIHAI returning to the ATM located at the uncovered portion of PFCU's Woodbridge branch's drive-through lane at approximately 3:35 p.m. on the same day and picking what appeared to be the camera up off from the ground. From this, federal law enforcement believed that the camera had fallen off from the ATM sometime after its installation. At approximately 3:44 p.m., MIHAI appeared to remove the skimmer from this ATM (see Figure 7). Of note, in this screenshot, MIHAI appeared to have long fingernails painted white and can be seen wearing a ring with a dark-colored jewel on the middle finger of her left hand. There also appeared to be a tattoo on the ring finger of her left hand.



Figure 7

13. Law enforcement observed footage that showed on or about 6:34 p.m. on the same day, STANCIU and MIHAI returned to the PFCU Kingstowne Branch ATM to remove the camera and skimmer. A log of this ATM's activity provided by PFCU showed that approximately 27 debit cards were used by customers at this ATM on this day during the time the skimmer and camera were installed.

14. At approximately 7:51 p.m., MIHAI and STANCIU removed the skimmer and camera from the ATM located at the covered portion of the Woodbridge branch's drive-through lane. Logs of activity from both Woodbridge branch ATMs showed that approximately 66 debit cards were used by customers at these ATMs on this day during the time the skimmer and camera were installed.

February 1, 2024 – PFCU Woodbridge Branch

15. Law enforcement observed footage that showed that on or about February 1, 2024 at approximately 7:39 a.m., MIHAI drove to an ATM located at PFCU's Woodbridge branch's covered drive-through lane and installed a camera (see Figure 8) and skimmer. MIHAI drove in a dark-colored Toyota minivan bearing Virginia license plate ending in the numbers 4259. Although MIHAI was wearing a facemask and hat that obscured her face, law enforcement believes this to be MIHAI based on several identifiers, including long, white-painted fingernails and the ring with a dark-colored jewel on the middle finger of her left hand (see Figure 9) – which resembles the ring worn by MIHAI the previous day in Figure 7.



Figure 8



Figure 9

16. At approximately 12:02 p.m. on this day, PFCU employees discovered and removed a skimmer from this ATM. Later at approximately 1:27 p.m., PFCU employees discovered and removed a camera. PFCU employees took a picture (see Figure 10) of these devices and provided it to law enforcement. The devices in the photograph appeared to resemble the devices that MIHAI installed earlier that day. This ATM's activity log showed that approximately eight debit cards were used at this ATM during the time the skimmer and camera were installed.



Figure 10

February 3, 2024 – PFCU Kingstowne and Woodbridge Branches

17. Law enforcement observed footage that showed MIHAI driving in the Toyota minivan with the same Virginia license plate ending in 4259 to an ATM located at PFCU's Woodbridge branch's uncovered drive-through lane on or about February 3, 2024 at approximately 2:08 p.m. to install a skimmer and camera (see Figure 11). Although MIHAI wore a face mask that obscured her face, law enforcement observed in Figure 11 that the woman in the footage had long, white-painted fingernails and again wore a ring with a dark-colored jewel on her left hand, although this time it was on her ring finger. Law enforcement also noted that MIHAI wore a ring with a pattern of rectangular dark jewels on her right ring finger and had a tattoo on her right ring finger (see Figure 12). Finally, law enforcement noted a tattoo on her left ring finger (see Figure 13) similar to that seen on MIHAI's left ring finger in Figure 7.



Figure 11



Figure 12



Figure 13

18. Law enforcement observed footage that showed that on or about February 3, 2024, at approximately 2:29 p.m., MIHAI drove to an ATM located at PFCU's Kingstowne branch in the Toyota minivan with Virginia license plate ending in 4259 and installed a camera (see Figure 14) and what appeared to be a skimmer.



Figure 14

19. Law enforcement observed footage that showed that at approximately 3:43 p.m. on this day, the camera fell from the PFCU Kingstowne branch ATM. On or about February 6, 2024, PFCU employees recovered the camera and later provided it as evidence to the Fairfax County Police Department ("FCPD").

20. Law enforcement observed footage that showed that at approximately 3:47 p.m. on or about February 3, 2024, MIHAI returned to PFCU's Woodbridge branch and hung a sign on an ATM located in the covered portion of the branch's drive-through lane. This ATM was different than the ATM located in the uncovered drive-through lane that she had installed a skimmer and camera on earlier that day at 2:08 p.m. From training and experience, your Affiant knows that fraudsters will often place "out of order" signs on functioning ATMs – which do not have skimmers installed – to encourage customers to only use ATMs that do have skimmers installed. Law enforcement believes MIHAI was doing exactly that on or about February 3, 2024, when she placed a sign on the ATM at PFCU's Woodbridge branch that did not have a skimmer installed.

21. Law enforcement observed footage that showed that on or about February 3, 2024, at approximately 4:57 p.m., STANCIU removed the skimmer from the PFCU Kingstowne branch ATM (see Figure 15). The activity log for this ATM showed that approximately thirteen PFCU debit cards were used at this ATM during the time the skimmer and camera were installed.



Figure 15

22. Law enforcement observed footage that showed that on February 3, 2024, at approximately 5:55 p.m., MIHAI returned to the PFCU Woodbridge branch to remove the skimmer and camera that she had installed earlier that day on the ATM located in the uncovered drive-through lane (see Figure 16). MIHAI also removed what law enforcement believes was the “out of order” sign from the functioning ATM located at the covered portion of the drive-through at this branch. ATM activity logs showed that approximately 22 debit cards were used at this ATM during the time the skimmer and camera were installed.



Figure 16

February 4, 2024 – PFCU Woodbridge Branch

23. Law enforcement observed footage that showed MIHAI on or about February 4, 2024, at approximately 8:52 a.m. driving to an ATM located at PFCU's Woodbridge branch's uncovered drive-through lane in the Toyota minivan with Virginia plate ending in 4259. At this ATM, MIHAI appeared to hang another "out of order" sign on a functioning ATM. Although MIHAI wore a hat and mask that obscured her face, law enforcement observed that the individual depicted in the surveillance footage again had long, white-painted nails and wore a ring with a dark-colored jewel on her left middle finger and had a tattoo on her left ring finger, consistent with that seen in Figure 7 (see Figure 17 and Figure 18, which is an enlargement of Figure 17). Law enforcement also observed that MIHAI had a ring with a pattern of rectangular dark jewels on her right middle finger as well as a tattoo on her right ring finger (see Figure 19), similar to those seen in Figure 12.



Figure 17



Figure 18



Figure 19

24. Law enforcement observed footage that showed that after MIHAI placed the sign on this ATM, MIHAI drove to an ATM located at the PFCU Woodbridge branch's covered drive-through lane and installed a skimmer and camera to it on or about 8:53 a.m. on that day (see Figure 20).



Figure 20

25. Law enforcement observed footage that showed on February 4, 2024, at approximately 5:32 p.m., MIHAI returned to the PFCU's Woodbridge branch in the Toyota minivan with Virginia plate ending in 4259 and removed the sign from the uncovered ATM as well as the skimmer and camera from the covered ATM. ATM activity logs show that during this time, approximately 55 debit cards were used at the covered ATM during the time the skimmer and camera had been installed.

Analysis of Skimming Incidents

26. Based on the aforementioned information, it appeared to law enforcement that a total of 191 debit cards were used at the PFCU ATMs between January 28, 2024, and February 4, 2024, when skimmers and cameras were installed. However, law enforcement analyzed the ATM logs and discovered that two of these debit cards had been used at these ATMs on multiple days, resulting in two cards being skimmed twice. Therefore, law enforcement believes that STANCIU and MIHAI skimmed card information from 189 separate debit cards while the skimmers and cameras were installed.

February 5, 2024 – PFCU Woodbridge Branch

27. Law enforcement observed footage that showed that on or about February 5, 2024 from approximately 12:36 a.m. to 1:51 a.m., STANCIU and MIHAI arrived at the PFCU's Woodbridge branch and attempted to access victim funds using the fraudulently obtained card data. Both STANCIU and MIHAI can be seen at the ATMs inserting cards with white backs and magnetic strips one at a time (see Figures 21 and 22) and manipulating the ATM keypads in a manner consistent with withdrawing funds from them. From training and experience, your Affiant knows that fraudsters oftentimes will use any available card with a magnetic strip, such as a gift card, on which to re-encode victim card information. Law enforcement also observed what appeared to be stickers on several of the white cards; your Affiant knows from training and experience that fraudsters often write victim PINs onto stickers and affix them onto cards with magnetic strips so that the fraudsters know which PIN to enter when attempting to access victim funds. Although both individuals depicted in the surveillance footage wore masks that obscured their faces, your Affiant believes one individual to be STANCIU based on his facial hair underneath his mask, as seen in previous PFCU surveillance footage. Furthermore, your Affiant believes the other individual to be MIHAI based on the same long, white-painted nails, ring with a pattern of rectangular dark jewels on the middle finger of her right hand, and a tattoo on the ring finger of her right hand (see Figure 23) as can be seen in Figure 12 and Figure 19.

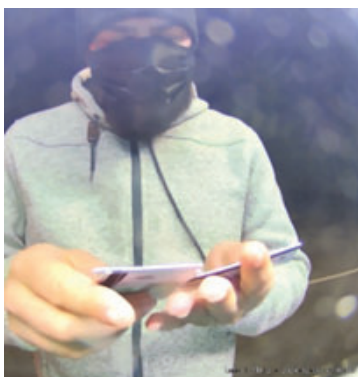


Figure 21



Figure 22



Figure 23

28. According to ATM activity logs, STANCIU and MIHAI attempted to obtain \$33,600 from 67 victim debit cards on or about February 5, 2024, from the PFCU Woodbridge branch ATMs, although they were only successful in obtaining \$2,900 from six victim debit cards. STANCIU and MIHAI only obtained \$2,900 for two reasons: the PFCU ATMs flagged many of the transactions as suspicious and denied them; or in some instances, STANCIU and MIHAI used the incorrect PINs. By comparing the ATM logs, law enforcement discovered that of the 67 victim cards used by STANCIU and MIHAI, 60 had been used by customers at PFCU ATMs at the Kingstowne and Woodbridge branches on January 28, 2024, February 3, 2024, or February 4, 2024, during which time the skimmers and cameras were installed. These included PFCU cards ending with -2450, -0558, and -8303.

Interviews with Skimming Victims

Victim R.W.

29. R.W. is a customer of PFCU. According to information voluntarily provided by PFCU to law enforcement, R.W. resides in Woodbridge, Virginia, and is the holder of a PFCU card ending in -2450. PFCU ATM activity logs showed that card -2450 was used at an ATM at PFCU's Woodbridge branch on or about February 3, 2024, during the time a skimmer and camera were installed. This card was later used by MIHAI on or about February 5, 2024, to withdraw approximately \$500 from R.W.'s bank account. Law enforcement interviewed R.W., who confirmed that this withdrawal was an unauthorized transaction and that he/she maintained possession of card -2450 when the withdrawal occurred on or about February 5, 2024.

Victim R.S.

30. R.S. is a customer of PFCU. According to information voluntarily provided by PFCU to law enforcement, R.S. resides in Woodbridge, Virginia, and is the holder of a PFCU card ending in -0558. PFCU ATM activity logs showed that card -0558 was used at an ATM at PFCU's Woodbridge branch on or about February 3, 2024, during the time a skimmer and camera were installed. This card was also used by MIHAI on or about February 5, 2024, to withdraw approximately \$500 from R.S.'s bank account. Law enforcement interviewed R.S., who confirmed that this withdrawal was an unauthorized transaction and that he/she maintained possession of card -0558 when the withdrawal occurred on or about February 5, 2024.

Victim D. B.

31. D.B. is a customer of PFCU. According to information voluntarily provided by PFCU to law enforcement, D.B. resides in Woodbridge, Virginia, and is the holder of a PFCU card ending in -8303. PFCU ATM activity logs showed that card -8303 was used at an ATM at PFCU's Woodbridge branch on or about February 3, 2024, during the time a skimmer and camera were installed. This card was also used by MIHAI on or about February 5, 2024, to withdraw approximately \$400 from D.B.'s bank account. Law enforcement interviewed D.B., who confirmed that this withdrawal was an unauthorized transaction and that he/she maintained possession of card -8303 when the withdrawal occurred on or about February 5, 2024.

Additional Skimming Incident

32. Law enforcement observed PFCU surveillance footage that showed that on or about February 17, 2024, at approximately 10:02 a.m., STANCIU and MIHAI installed a skimmer and camera onto an ATM located at PFCU's Tysons branch, which is located in Tysons, Virginia. STANCIU and MIHAI travelled to this ATM in what appeared to be a dark-colored minivan, similar to that seen in previous PFCU surveillance footage. PFCU employees saw this activity on their surveillance systems and notified the FCPD. FCPD officers responded to this PFCU branch at approximately 10:10 a.m. and retrieved a skimmer and camera from the ATM. FCPD took pictures of the recovered devices and provided them to the FBI and USSS; these devices appeared to be identical to the devices that law enforcement observed STANCIU and MIHAI installing previously on the PFCU surveillance footage. Law enforcement also observed PFCU surveillance footage that showed that at approximately 12:52 p.m. on or about February 17, 2024, MIHAI returned to this ATM and appeared to be looking for the skimmer and camera. MIHAI did not appear to use the ATM to make a transaction as a normal customer would, and instead paced in front of the ATM several times while speaking on her cellphone before eventually walking away.

Identification of STANCIU and MIHAI

33. The law enforcement investigation revealed two possible matches for the male and female individuals depicted in the surveillance footage. Your Affiant reviewed the driver's license of both individuals. Specifically, your Affiant obtained a driver's license photograph from the state of Florida for STANCIU and obtained a driver's license photograph from the state of Washington for MIHAI. Both depicted individuals appear to be the same individuals involved in the conspiracy described herein. Your Affiant then determined that both STANCIU and MIHAI reside together in Rowland Heights, California. Next, your Affiant obtained travel information for STANCIU and MIHAI, which revealed that the two had flown together on the same flight from Los Angeles to Northern Virginia four months prior to the criminal conduct.

CONCLUSION

34. I respectfully submit that this affidavit supports probable cause to believe that, from on or about January 28, 2024, to February 17, 2024, in the Eastern District of Virginia, GAVRILA STANCIU and ANAMARIA MIHAI did knowingly and with intent to defraud violate Title 18 U.S.C §§ 1029(b)(2) and (a)(2) (conspiracy to commit access device fraud). During this time period, STANCIU and MIHAI conspired together to compromise at least approximately 189 victim bank cards and caused or attempted to cause more than \$1,000 dollars in losses to victim accounts.



George J. Jasek
Special Agent
United States Secret Service

Reviewed by:

Sworn to and subscribed before me this 3rd day of June, 2024.



Digitally signed by Ivan Davis
Date: 2024.06.03 11:12:07 -04'00'

The Honorable Ivan D. Davis
United States Magistrate Judge